

**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY**

<b>MARINA NIKOLAEVA and</b>	)	
<b>ANDREW DANKO,</b>	)	
	)	
<b>Plaintiffs,</b>	)	<b>Civil No. 2:21-cv-19977-SDW-JSA</b>
<b>v.</b>	)	
	)	
	)	
<b>SPARTA TOWNSHIP BOARD</b>	)	
<b>OF EDUCATION; NEW JERSEY</b>	)	<b>Judge: Susan D. Wigenton</b>
<b>DEPARTMENT OF</b>	)	
<b>EDUCATION; and KEVIN</b>	)	<b>Magistrate: Jessica S. Allen</b>
<b>DEHMER, Commissioner of</b>	)	
<b>Education, in his official capacity,</b>	)	<b>MOTION DATE: August 18, 2025</b>
	)	
<b>Defendants.</b>	)	
	)	

**NOTICE OF MOTION**

To: ALL COUNSEL OF RECORD

**PLEASE TAKE NOTICE** that as soon as counsel may be heard  
Respondents Robert Thurston and Thurston Law Offices LLC, by and through  
counsel, and pursuant to Rule 12(f) of the Federal Rules of Civil Procedure shall  
present their Motion to Strike in this action.

**PLEASE TAKE FURTHER NOTICE** that in support of their Motion,  
Respondents shall rely upon the papers submitted and filed contemporaneously  
herewith.

A proposed form of Order is also submitted.

Dated: July 29, 2025

THURSTON LAW OFFICES LLC

By: /s/ Robert C. Thurston

Robert C. Thurston, Esq.

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*Attorney for Respondents*

**CERTIFICATE OF SERVICE**

I, Robert C. Thurston, certify that I served all parties and counsel of record the foregoing document by causing the same to be sent via the ECF system for eFilers and via regular mail for non-eFilers on July 29, 2025:

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